

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

SHELDON LOCKETT,

Plaintiff,

v.

COUNTY OF LOS ANGELES, et al.

Defendants.

Case No.: 18-CV-5838-DSF (JPR)

**JOINT EXHIBIT LIST**

***Final Pre-Trial Conference:***

Date: November 15, 2021

Time: 3:00 p.m.

Judge: Hon. Dale S. Fischer

Courtroom: 7D

Courthouse: First Street Courthouse  
350 West 1st Street  
Los Angeles, CA

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
1	[Lockett depo Vol 1, Ex. 1] Sheriff Dept. Supplemental Report		
2	[Lockett depo Vol 1, Ex. 2] 212 Bus Route		
3	[Lockett depo Vol 1, Ex. 3] Google Map with handwritten markings [Lockett depo Vol 1, Ex. 3A] Google Map		
4	[Lockett depo Vol 1, Ex. 4] Google Maps close up		
5	[Lockett depo Vol 1, Ex. 5] Photograph		
6	[Lockett depo Vol 1, Ex. 6] Photograph – Timothy Campbell's house		
7	[Lockett depo Vol 1, Ex. 7] Photograph		
8	[Lockett depo Vol 1, Ex. 8] Map marked by Lockett		
9	[Lockett depo Vol 1, Ex. 9] Photograph of area where Lockett was hiding		
10	[Lockett depo Vol 1, Ex. 10] Photograph of area where Lockett was hiding		
11	[Lockett depo Vol 1, Ex. 11] Photograph of area where Lockett was hiding		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
12	[Lockett depo Vol 1, Ex. 12] Photograph of area where Lockett was hiding		
13	[Ross depo Ex 1] Notice of Depo for Ross		
14	[Ross depo Ex 2] Incident Report		
15	[Ross depo Ex 3] Photograph of house		
16	[Embleton Ex] Taser User Certification Course Materials		
17	[Embleton Ex] 2011 Electronic Control Weapon Guidelines		
18	[Embleton Ex] marked up version of Ex 12 – patio where Lockett found		
19	[Embleton Ex] Taser Evidence Sync		
20	[Embleton Ex] Embleton Narrative		
21	[Embleton Ex] Aldama tattoo		
22	[Lockett depo Vol 2 Ex] Lockett tattoo photos		
23	[Aldama depo Ex] set of Bates stamped documents		
24	[Aldama depo Ex] Transcription of Ivett Silva 911 call		
25	[Aldama depo Ex] tattoo photo 1		
26	[Aldama depo Ex] tattoo photo 2		
27	[Aldama depo Ex] tattoo photo 3		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
28	[Aldama depo Ex] Mr Skully photo		
29	[Aldama depo Ex] LASD manual -- Volume 3 – Chapter 1 – “policy and ethics”		
30	[Aldama depo Ex] NY times article		
31	[Aldama depo Ex] Google street view photo 1213 W Spruce – marked by Aldama at depo		
32	[Feria depo Ex] Ex 18 marked up by Feria		
33	[Thatcher depo Ex] Deposition notice for Thatcher		
34	[Thatcher depo Ex] LA Times article “LA County sheriff announces inquiry into secret societies of deputies and their tattoos”		
35	[Thatcher depo Ex] Motion by Supervisors Kuhl and Solis – 4/2019 “Assessing County Liability in Settlements Involving Sheriff ‘Gangs’”		
36	[Thatcher depo Ex] Los Angeles County Sheriff Civilian Oversight Commission “Constitutional Implications of Investigating Deputy Cliques”		



<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
37	[Campbell, T depo Ex] Notice of Deposition and Subpoena of Timothy Campbell		
38	[Campbell, T depo Ex] Defendant County of Los Angeles' Amended Notice of Taking the Deposition of Timothy Campbell		
39	[Campbell, T depo Ex] Map		
40	[number skipped]		
41	[number skipped]		
42	[number skipped]		
43	[number skipped]		
44	[number skipped]		
45	[Campbell, G depo Ex] Subpoena for deposition		
46	[Campbell, E depo Ex] Subpoena for deposition		
47	[Campbell, E depo Ex] Color Printout of Google Maps View of 1213 West Spruce Street		
48	[Benzor depo Ex] Deposition notice for Benzor		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
49	[Benzor depo Ex] Copy of Penal Code §118		
50	[Benzor depo Ex] POST Learning domain Chapter 6		
51	[Benzor depo Ex] Color photograph of leg tattoo		
52	[Benzor depo Ex] Photograph of Benzor's tattoo USB drive		
53	[Jaeger depo Ex] COLA's Supplemental Responses to Plaintiff's Special Interrogatories		
54	[Benzor depo Ex] Benzor's Supplemental Report		
55	[Benzor depo Ex] Excerpts of Imunique Ross' Deposition		
56	[Orrego depo Ex] POST Learning Domain 1		
57	[Orrego depo Ex] POST Learning Domain 18		
58	[Orrego depo Ex] Aldama tattoo photo (from Taylor case)		
59	[Orrego depo Ex] Aldama tattoo photo (from LA times)		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
60	[Orrego depo Ex] Orrego graphs -- Bates 1477-1478.pdf		
61	[Orrego depo Ex] Orange arrest documents -- Bates 302-319.pdf		
62	[Orrego depo Ex] 1213 W Spruce -- google street view.pdf		
63	[Orrego depo Ex] Bates 239 245 Broadcast.wav		
64	[Orrego depo Ex] TRANSCRIPT OF Bates 239 -- 3-17 PM CALL.pdf		
65	[Orrego depo Ex] Watch Commander Log - Bates 362-364.pdf		
66	[Orrego depo Ex] Map of area.pdf		
67	[Orrego depo Ex] Bates 238 10-33 Broadcast Rosecrans-Tajuata.wav		
68	[Orrego depo Ex] TRANSCRIPT OF Bates 238 -- 3-36 PM CALL.pdf		
69	[Orrego depo Ex] Patio (exterior) where Lockett found -- Bates 173.pdf		
70	[Orrego depo Ex] Patio where Lockett found -- Bates 171.pdf		
71	[Orrego depo Ex] Aldama and Orrego reports -- Bates 410-426.pdf		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
72	[Aldama depo vol 2 Ex] Incident Report - - full set 13 pages		
73	[Aldama depo vol 2 Ex] Incident Thatcher 6-8-18 email -- Bates 1560-1561.pdf		
74	[Orrego depo Ex] TRANSCRIPT OF Bates 238 -- 3-36 PM CAL – corrected by OrregoL.pdf		
75	[30(b)(6) – Jaeger depo Ex] Notice of Continuance of Taking Deposition of Defendants County of Los Angeles and Los Angeles County Sheriff’s Department		
76	[30(b)(6) – Jaeger depo Ex] County of LA’s Objection to and Motion to Strike Plaintiff’s Motion in Limine to Exclude Reference to the Regulators		
77	[30(b)(6) – Tyler depo Ex] Notice of Continuance of Taking Deposition of Defendants County of Los Angeles and Los Angeles County Sheriff’s Department		
78	[30(b)(6) – Tyler depo Ex] 32nd Semiannual Report by Special Counsel - Los Angeles County Sheriff’s Department May 2013		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
79	[30(b)(6) – Tyler depo Ex] Exemplar Lancaster Sheriff tattoo		
80	[30(b)(6) – Tyler depo Ex] Rand “Understanding the Role of Subgroups Within the Los Angeles County Sheriff’s Department”		
81	[Patel depo] Patel reports		
82	[Patel depo] Photos of batons		
83	[Kuehn depo] Kuehn reports – Brain CT		
84	[Kuehn depo] Kuehn reports – chest x-ray		
85	[Kuehn depo] Baton photos		
86	[Reynold’s depo] Cell phone record pages (7 pages)		
87	[Shinn depo] Shinn CV		
88	[Shinn depo] Shinn report		
89	[Shinn] Orrego tattoo 1 [back]		
90	[Shinn] Orrego tattoo 2 [front]		
91	[Shinn] Orrego tattoo 3 [center]		
92	[Garcia depo] Garcia report		
93	[Garcia depo] Excerpts from Thatcher depo		
94	[Garcia depo] Orrego arrest/booking stats		
95	[Garcia depo] Aldama arrest/booking stats		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
96	[Garcia depo] [group of census documents from Garcia file]		
97	[Garcia depo] [list of attachments with ACS DP files]		
98	[Clark depo] Clark CV		
99	[Clark depo] “Materials Provided to Roger Clark” document		
100	[Clark depo] OSS tattoo		
101	[Clark depo] Banditos tattoo		
102	[Gabler depo] Gabler Preliminary Report		
103 -1	[Eisen depo] Eisen report		
103 -2	[Eisen depo] Eisen – table of witnesses		
103 -3	[Eisen depo] Eisen – list of case materials		
104	[Eisen depo] Eisen – California Peace Officers Sourcebook (excerpt)		
105	[Gonzalez depo] Gonzalez – Claim for damages		
106	[Gonzalez depo] Gonzalez – shift list with Executioners and Prospects		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
107	[Gonzalez depo] Gonzalez – signed Attachment to Protective Order - Gonzalez		
108	[Gonzalez depo] Gonzalez – signed Attachment to Protective Order - Romero		
109	[Gonzalez depo] Gonzalez – photo of Executioner mouse pad and mouse		
110	[Gonzalez depo] Gonzalez – Solomon video [retained by counsel]		
111	[Joshua depo] Joshua – email re production		
112	[Joshua depo] Joshua – Notice of Continuance of Deposition		
113	[Joshua depo] Joshua – copy of Dropbox page		
114	[Joshua depo] Joshua – screen shot of Hurrel letter		
115	[Orquilola depo] Orquilola – Preliminary Hearing Transcript		
116	[Orquilola depo] Orquilola – Criminal docket		
117	[Orquilola depo] Orquilola – Deposition Notice		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
118	[Gonzalez depo] Gonzalez – Dominguez/Vargas Instagram video [retained by counsel]		
119	[Flores depo] Flores resume		
120	[Flores depo] Penal Code Section 186.22		
121	[Saba depo] Saba Resume		
122	[Saba depo] Saba production		
123	“The Fight Flight Freeze Response” video [from <a href="https://www.youtube.com/watch?v=jEHwB1PG_-Q">https://www.youtube.com/watch?v=jEHwB1PG_-Q</a> ]		
124	“The Fight or Flight Response” chart		
125	Timeline Report from Cellebrite Extraction for afternoon of 1/15/16		
126	Timeline of events		
127	Documents establishing Aldama’s net worth [to be subpoenaed for trial]		
128	Laboratory Examination Report – Fritz – 3/17/16		
129	Laboratory Examination Report – Fritz – 6/7/16		
130	“Laboratory Report” – Wong – 6/15/16		



<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
131	Cook, M. 2016 Gunshot residue contamination of the hands of police officers following start of shift handling their firearms. Forensic Science International 269:56-62.		
132	Wright, D. and Trimpe, M. 2006. Summary of the FBI Laboratory's gunshot residue symposium. Forensic Science Communications. 8(3):1-17.		
133	Burnett B.R. and Lebieczik J. Discharge of a pistol out a car window with the breech within the interior of the car: Analysis of gunshot residue on a car's interior surface. Journal of Forensic Sciences 62(3):768-772		
134	Expert Michele Cooley-Strickland, M.Ed., Ph.D.'s Rule 26 Report *(for reference only)		
135	Expert Roger Clark's Rule 26 Report *(for reference only)		
136	Expert Bryan R. Burnett's Rule 26 Report *(for reference only)		
137	Expert Ed Garcia's Rule 26 Report *(for reference only)		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
138	Expert Motti Gabler's Rule 26 Report *(for reference only)		
139	Expert Mitchell L. Eisen, Ph.D.'s Rule 26 Report *(for reference only)		
140	Expert Charles P. Shinn's Rule 26 Report *(for reference only)		
141	Expert Michael E. Kraut's Rule 26 Report *(for reference only)		
142	[intentionally omitted]		
-			
150			
151	Unofficial transcript from Los Angeles Southwest College		
152	Lyft ride receipt – 1/15/16 [separated out from Ex. 1]		
153	Supervisor's Report on Use of Force -- Bates 382-389.pdf		
154	Watch Commander's Service Comment Review -- bates 370-377		
155	Aldama graphs -- Bates 1417-1418.pdf		
156	Aldama history – Bates 1413-16; 1472		
157	Aldama training – Bates 275-285		
158	Orrego history – Bates 1473-76		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
159	Orrego training – Bates 286-293		
160	Field identification card – Bates 1411-1412		
161	Felony Complaint – Bates 93-98		
162	Feria Narrative report – Bates 437		
163	Orrego tattoo photos (4)		
164	“Bates 232 Interview of Suspect Lockett”		
165	Transcript of “Bates 232 Interview of Suspect Lockett”		
166	“Bates 233 WC Interview”		
167	“Bates 234 WC interview cont”		
168	transcript of Bates 233 and 234 “WC Interview”		
169	“Bates 235 911B Oleander”		
170	Transcript of “Bates 235 911B Oleander”		
171	“Bates 236 1600608-1wd”		
172	Transcript of “Bates 236 1600608-1wd”		
173	“Bates 237 1600608-2cmp-01”		
174	Transcript of “Bates 237 1600608-2cmp-01”		
175	“Bates 240 280S and Aero Ack”		
176	Transcript of “Bates 240 280S and Aero Ack”		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
177	"Bates 241 L-tac-5 011516 1510 to 1610 hrs"		
178	Transcript of "Bates 241 L-tac-5 011516 1510 to 1610 hrs"		
179	"Bates 242 Handling Unit Call Coordination"		
180	Transcript of "Bates 242 Handling Unit Call Coordination"		
181	"Bates 243 Suspect in Custody and Article Search"		
182	Transcript of "Bates 243 Suspect in Custody and Article Search"		
183	"Bates 244 Units responding to Oleander and Maple 245"		
184	Transcript of "Bates 244 Units responding to Oleander and Maple 245"		
185	"Bates 245 WC Bridge"		
186	Transcript of "Bates 245 WC Bridge"		
187	Crime Analysis Supp Form		
188	Patio where Lockett found -- Bates 172.pdf		
189	Personnel Investigation Report -- Bates 1333-1410.pdf		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
190	Penal Code §69 Obstructing or resisting executive officer in performance of duties		
191	Penal Code §187 Murder defined		
192	Penal Code §246 Shooting at inhabited dwelling house occupied building vehicle or aircraft		
193	Penal Code §417 Drawing exhibiting or using firearm or deadly weapon self defense peace officer		
194	Penal Code §664 Attempts punishment		
195	Penal Code §12022.53 Sentence enhancements for persons convicted of enumerated felonies		
196	Penal Code §25400 Carrying concealed firearm punishment minimum sentence		
197	Penal Code §26100 Permitting loaded firearm in motor vehicle discharge of firearm from motor		
198	Compton Municipal Code 7-8.3		
199	Penal Code §186.22. Participation in criminal street gang		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
200	Demographic Information for Compton chart [from Garcia report]		
201	Characteristic as a Percent of Total Population, Compton chart [from Garcia report]		
202	Orrego's Analysis Chart [from Garcia report]		
203	Aldama's Analysis Chart [from Garcia report]		
204	Drone video		
205	Burnett/Villanueva interview video 9/15/20		
206	Gonzalez v County of LA – complaint		
207	Waldie v County of LA – First Amended Complaint		
208	Guzman claim for damages		
209	Banuelos claim for damages		
210	[intentionally omitted]		
211	"Fifty Years of "Deputy Gangs" in the Los Angeles County Sheriff's Department: Identifying Root Causes and Effects to Advocate for Meaningful Reform"		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
212	Resolution Expressing No Confidence in Sheriff Alex Villanueva's Leadership of the Los Angeles County Sheriff's Department and Condemning His Failure to Cooperate with Civilian Oversight		
213	Office of Inspector General "Report Back on Unlawful Conduct of the Los Angeles County Sheriff's Department" [12/14/20]		
214	Fifty Years of Deputy Gangs in the Los Angeles County Sheriff's Department" [final]		
215	Video of Sheriff Villanueva's press conference on 5/26/21, accessible at <a href="https://youtu.be/pILyOhZBHRQ">https://youtu.be/pILyOhZBHRQ</a>		
216	LASD summary of Sheriff Villanueva's press conference on 5/26/21		
217	Spectrum News 1 video "Outgoing Compton mayor alleges fraud by sheriff's department" 5/31/21, accessible at <a href="https://spectrumnews1.com/ca/la-west/public-safety/2021/05/31/outgoing-compton-mayor-alleges-fraud-by-sheriff-s-department">https://spectrumnews1.com/ca/la-west/public-safety/2021/05/31/outgoing-compton-mayor-alleges-fraud-by-sheriff-s-department</a>		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
218	Spectrum News 1 text “Outgoing Compton mayor alleges fraud by sheriff’s department” 5/31/21		
219	Los Angeles Times column 7/25/21 "Sheriff Villanueva is angry - at elected officials, at The Times, at lawlessness"		
220	“Jump Out Boys Creed”		
221	Fifth Amended Complaint in Hernandez, et al. v. County of Los Angeles, et al., Los Angeles Superior Court Case No. 19STCV33158		
222	Los Angeles Times article 9/10/21 “Deputy cliques in L.A. County Sheriff’s Department likely growing, study finds”		
223	Rand “Understanding Subgroups Within the Los Angeles County Sheriff’s Department: Community and Department Perceptions with Recommendations for Change”		
224	Rand Appendixes to “Understanding Subgroups Within the Los Angeles County Sheriff’s Department: Community and Department Perceptions with Recommendations for Change”		



EX. No.	DESCRIPTION	IDENTIFIED	ADMITTED
225	Los Angeles Times article 9/16/21 "L.A. County Sheriff Has Legal Power to Ban Gang-like Groups of Deputies, County Lawyers Say"		
226	Letter from County of Los Angeles, Office of the County Counsel 8/19/21 re "Request for Legal Opinion Regarding Policy to Prohibit Sheriff's Department Employees from Participating in Subgroups".		
227	"Defendants' Objection to and Motion to Strike Plaintiff's Motion in Limine to Exclude Reference to the Regulators; Memorandum of Points and Authorities in Opposition" filed in <i>James v. County of Los Angeles, et al.</i>		
228	Transcript of Burnett/Villanueva interview video 9/15/20		
229 - 300	[Reserved for additional plaintiff exhibits]		
301	Video of Plaintiff's Subsequent Interaction with Police		

<b>EX. No.</b>	<b>DESCRIPTION</b>	<b>IDENTIFIED</b>	<b>ADMITTED</b>
302	Expert Chapman's R. 26 Report *(for reference only)		
303	Expert Anthony Readings R. 26 Report *(for reference only)		
304	Expert Darryl R. Zengler's Rule 26 Report *(for reference only)		
305	Expert Jeronimo Casasola's Rule 26 Report *(for reference only)		
306	Expert Dr. Alfred A. Joshua's Rule 26 Report *(for reference only)		
307	Use of Force Chart		
308	3-10/009.00 – Force prevention and De-Escalation Principles (Los Angeles Sheriff's Department Force Policy)		
309	3-10/020.00 – Use of Force Policy		
310	3-10/030.00 – Unreasonable Force and Duty to Intervene		
310 - 360	Reserved for Defendants Additional Exhibits.		

///

///

1 DATED: October 21, 2021 THE SWEENEY FIRM

2 and

3 GLICKMAN & GLICKMAN,  
4 A LAW CORPORATION

5  
6 By /s/ Steven C. Glickman  
7 John E. Sweeney  
8 Steven C. Glickman  
9 Attorneys for Plaintiff  
SHELDON LOCKETT

10 DATED: October 21, 2021 IVIE, McNEILL & WYATT

11  
12 By /s/ Davida M. Frieman  
13 Rickey Ivie  
14 Davida M. Frieman  
15 Attorneys for Defendant  
COUNTY OF LOS ANGELES

16 DATED: October 21, 2021 SEKI NISHIMURA & WATASE, LLP

17  
18 By /s/ Andrew Pongracz  
19 Gilbert Nishimura  
20 Andrew Pongracz  
21 Attorneys for Defendant  
22 SAMUEL ALDAMA  
23  
24  
25  
26  
27  
28